

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S MOTION FOR LEAVE TO FILE TWO-
PAGE SUPPLEMENT EX PARTE AND UNDER SEAL**

On October 14, 2020, the Court permitted defendants Elisabeth Kimmel, Gamal Abdelaziz, and John Wilson to file a motion to compel ex parte and under seal (the "Ex Parte Motion"). Wilson seeks to file a 2-page supplement to the Ex Parte Motion. He hereby moves for leave to file that supplement ex parte and under seal. The grounds for the request are that—like the Ex Parte Motion itself—Wilson's supplement concerns an ex parte pretrial subpoena, and the substance of the supplement would reveal confidential defense-strategy information. *See United States v. Diamont*, No. 05-cr-10154, slip op. at 5 (D. Mass. Nov. 22, 2005).

Respectfully submitted:

Counsel to John Wilson:

/s/ Michael Kendall

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that counsel to Wilson did not confer with the government about this Motion, given that the Motion concerns submission to be filed ex parte and under seal, with no copy to the government.

/s/ Michael Kendall
Michael Kendall